

Exhibit B

Affidavit of Kayla Adams

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ALYSON RUBIN and
JENNIFER HICKEY,

Plaintiffs,

v.

CAPTAIN LEWIS YOUNG,
Individually and in his official capacity
As Chief of the Capitol Police Division
of the Georgia Department of Public
Safety, et al.,

Defendants.

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CIVIL ACTION
FILE NO. 1:19-CV-1158-SCJ

AFFIDAVIT OF KAYLA ADAMS

1.

Personally appearing before me, the undersigned officer duly authorized to administer oaths in and for the State of Georgia, KAYLA ADAMS who, after being duly sworn, deposes and states the following:

2.

My name is KAYLA ADAMS, and I am sui juris and competent to testify in this matter and under no civil or legal disability.

3.

I give this Affidavit as evidence in the above-styled action and for any other lawful purpose.

4.

I make this Affidavit based on my personal knowledge of its contents and review of records routinely and regularly maintained in the ordinary course of business by the Georgia Capitol Museum.

5.

I am currently employed as the Tour and Education Manager for the Georgia Capitol Museum. In this role, I conduct tours of the Georgia Capitol for visitors, evaluate visitor experiences at the Georgia Capitol, develop educational programming and content for the Capitol, oversee the scheduling of tours, develop partnerships with groups in the community for educational opportunities, and manage the Georgia Capitol Museum's volunteer program.

6.

Many of the guided tours at the Georgia Capitol involve children. An estimated 17,000 to 25,000 students visit the Georgia Capitol each year for guided tours, mostly during the months of January through May. Most of the student tours are for elementary-aged children. In 2018, approximately 70% of the student visitors between January and May were from elementary schools.

7.

The remaining Georgia Capitol student visitors for 2019 include tours already scheduled for 3/13/19; 3/14/19; 3/15/19; 3/18/19; 3/19/19; 3/20/19;

3/21/19; 3/22/19; 3/25/19; 3/26/19; 3/27/19; 3/28/19; 3/29/19; 4/2/19; 4/3/19; 4/5/19; 4/8/19; 4/9/19; 4/10/19; 4/11/19; 4/12/19; 4/15/19; 4/16/19; 4/17/19; 4/18/19; 4/19/19; 4/22/19; 4/23/19; 4/24/19; 4/25/19; 4/26/19; 4/29/19; 4/30/19; 5/1/19; 5/2/19; 5/2/19; 5/3/19; 5/6/19; 5/7/19; 5/8/19; 5/9/19; 5/10/19; 5/13/19; 5/14/19; 5/15/19; 5/16/19; 5/17/19; and 5/20/19. The vast majority of student tours remaining for 2019 are for elementary school students.

8.

In addition to student tours, self-guided tour groups led by legislators or other parties are estimated to account for an additional 34,000 to 50,000 visitors to the Georgia Capitol during the months of January through May.

9.

The tours are conducted beginning in the Rotunda and move throughout the Capitol Building. They generally discuss Georgia History, the Capitol Building, and the lawmaking process. Tours end in the Georgia House of Representatives and the Georgia State Senate. Groups are offered the opportunity to walk through the galleries or to sit in the public galleries. Once tours end, the groups roam freely through the building. Protestors can be encountered anywhere in the building.

10.

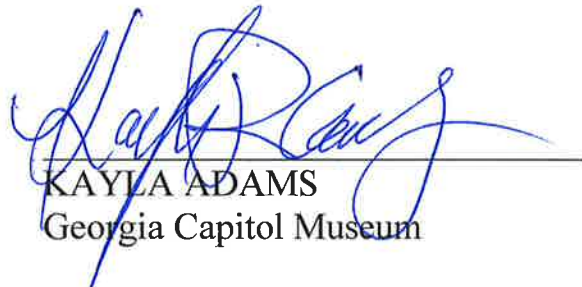
Records of weekly tour traffic are created and maintained through the tour desk of the Georgia Capitol. My office collects and compiles the tour group

information at the time the tours are scheduled, and creates the weekly traffic report at the start of each week. I make and maintain the reports myself in the ordinary course of business. A true and accurate copy of the weekly traffic reports from January 2018 to present are attached hereto as Exhibit B-1.

11.

The weekly traffic reports reflect the tours and visitors scheduled for the upcoming week. Not every visitor to the Georgia Capitol is captured in the weekly traffic report. Only those groups who schedule through our office are included in the report. Visitors who are hosted by a Legislator or who visit the Capitol unscheduled are not included in the weekly traffic report.

This 13 day of March, 2019.


KAYLA ADAMS
Georgia Capitol Museum

Sworn to and subscribed before me

This 13th day of March, 2019.


NOTARY PUBLIC

My commission expires:

